USDC SDNY DOCUMENT

DOCUMENT ELECTRONICALLY FILED

DOC#:

MEMO ENDORSED

DATE FILED: 4/20/2020

+1 212 506 5000

orrick.com

Ellen M. Murphy

E emurphy@orrick.com

D +1 212 506 3659

F +1 212 506 5151

April 15, 2020

Via Email

Honorable Andrew Carter Southern District of New York Thurgood Marshall Courthouse 40 Foley Square New York, NY 10007

Re:

United States v. Larry Smith, 18 Cr. 420

Dear Judge Carter:

This firm represents Larry Smith in the above-captioned matter. We write to respectfully request that the Court grant the sureties of Mr. Smith's bond an extension to sign the bond.

Your Honor granted Mr. Smith's bail application on April 7, 2020 and permitted Mr. Smith to be released on his own signature and granted a week for the sureties to sign the bond. We received the bond on April 8, 2020 and signed on Mr. Smith's behalf. Mr. Smith was released on April 9, 2020. The sureties on the bond, including Mr. Smith's fiancé, remain willing to sign the bond but due to the various business closures related to COVID-19 they are having difficulties finding a way to print the bond to sign and scan it or otherwise get a copy of the executed bond back to us. They are continuing to work on finding a way to print the documents. We ask that the Court extend the period for the sureties to execute and return the signed bond until April 21, 2020. In the event that the sureties are unable to locate a place to print the bond by tomorrow, we will have the bond printed and delivered to them overnight to execute and return to us to ensure we meet this new proposed deadline. I have communicated with AUSA Jacob Warren and he has no objection to our application.

For the foregoing reasons, we respectfully request that the Court extend the time for the sureties to sign Mr. Smith's bond until April 21, 2020.



Honorable Andrew Carter April 15, 2020 Page 2

Please feel free to contact me if the Court has any questions or requires any additional information.

Respectfully submitted,

/s/ Ellen M. Murphy

Ellen M. Murphy

cc: AUSA Jacob Warren (via email) AUSA Christopher Clore (via email)

> HON, ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE

April 20, 2020